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February 16, 2018

FILED ELECTRONICALLY

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Meeting: Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, ET Docket No. 13-49

Dear Ms. Dortch:

On behalf of the Intelligent Transportation Society of America ("ITS America") and pursuant to Section 1.1206(b) of the Commission's Rules (47 C.F.R. § 1.1206(b)), notice is hereby provided regarding an *ex parte* meeting on February 15, 2018 between representatives of ITS America and the Office of Engineering and Technology (OET). Attending on behalf of ITS America were Ron Thaniel, Vice President Legislative Affairs; Steven Bayless, Vice President Regulatory Affairs & Public Policy; Jason Goldman, Vice President External Affairs & Stakeholder Engagement; and Matthew Baker and the undersigned of Squire Patton Boggs (US) LLP as counsel to ITS America. Attending on behalf of OET were Julius Knapp, Chief Engineer; Ronald Repasi, Deputy Chief; Matthew Hussey, Associate Chief of Policy; Jamison Prime, Chief of the Policy and Rules Division; Karen Rackley, Technical Rules Branch Chief; Nicholas Oros, Spectrum Policy Branch Chief; Howard Griboff, Special Counsel; Aole Wilkins; William Hurst, Technical Research Branch Chief and, by telephone, Rashmi Doshi, Chief; and Reza Biazaran of the Laboratory Division.

The participants discussed the status of testing by OET of the potential for sharing between the Dedicated Short Range Communication Service (DSRCS) and Unlicensed National Information Infrastructure (U-NII) devices in the 5850-5925 MHz band. The parties discussed the status and timing of the Phase I test report. Additionally, ITS America distributed and discussed a letter that was provided to U.S. Department of Transportation Secretary Elaine Chao in November 2017, in which it reiterated its support for the development of a nationwide standard that will allow vehicles on the road to communicate with each other and with

surrounding infrastructure. Attached is a copy of the letter to the Department of Transportation that was shared with the participants of the *ex parte* meeting.

If there are any questions regarding this notice, please contact the undersigned.

Sincerely,

/s/ Robert B. Kelly

Robert B. Kelly

Attachment

cc: Julius Knapp; Ronald Repasi; Matthew Hussey; Jamison Prime; Karen Rackley; Nicholas Oros; Howard Griboff; Aole Wilkins; William Hurst; Rashmi Doshi; Reza Biazaran

November 20, 2017

The Honorable Elaine Chao
Secretary
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Dear Secretary Chao:

With the rapid pace of innovation and advances in connected and automated vehicle technology, transportation is undergoing a revolutionary transformation in the United States. Under your guidance and leadership, we believe the United States can remain a global leader in leveraging new technology to ensure a safer, more efficient transportation system that will help reduce fatalities, increase efficiency, and improve mobility. The undersigned associations, companies, industries, and organizations are writing to express our continued support for vehicle-to-vehicle (V2V) and vehicle-to-infrastructure (V2I) communications, and to strongly urge the Department of Transportation to remain fully committed to the widespread deployment of connected vehicle technology, and, to that end, assure that the 5.9GHz Safety Spectrum remains protected from harmful interference.

Automated driving systems continue to advance, and combining them with connected driving holds the potential to dramatically reduce traffic fatalities and injuries and to improve throughput on existing roads. V2V and V2I communications can augment and support automated driving systems across all levels of automation, providing additional information about the surrounding roadway environment, allowing for safer, smarter decision-making within a mixed fleet environment – where automated vehicles will be operating on the same roads as conventional (i.e., not highly automated) vehicles, motorcycles, bicycles and pedestrians. Furthermore, even before automated driving systems are widely deployed, V2V and V2I communication can provide significant safety benefits for conventional vehicles as DOT studies have shown.[1]

Dedicated Short Range Communications (DSRC) provides a key foundation for V2V and V2I safety by enabling connectivity between elements of our transportation system that have, until now, never been linked in large scale. DSRC can ensure a common interoperable safety standard for vehicles, regardless of size, make and model, to help avoid crashes, optimize traffic flow, and reduce congestion. We cannot overemphasize the critical importance of V2V and V2I as an enabler of future mobility, and caution that in the absence of an interoperable standard for vehicle communications, we may not fully realize our collective ambitions. The Department therefore plays a key role in ensuring the policy environment to support widespread deployment of this enabling technology.

[1] Vehicle-to-Vehicle Communications: Readiness of V2V Technology for Application, DOT HS 812 014

The Department of Transportation (DOT) can best support this future by establishing one nationwide, interoperable standard that allows vehicles on the road to communicate with other road users and with surrounding infrastructure. We urge DOT to continue its efforts to establish a uniform federal standard for vehicle-to-vehicle (V2V) safety communications nationwide. If the Department were to step back from this effort, DOT would be missing a major opportunity to deploy a truly game-changing vehicle safety technology and would undermine a long term effort that has spanned administrations to modernize and electronically interconnect our transportation infrastructure. While other areas of the transportation sector have observed challenges as a result of non-interoperable systems, such as in tolling systems, a single standard for V2V and V2I and related traffic control systems enables industry to focus on the development of new applications with greater certainty surrounding interoperability. Ensuring one standard provides the foundation for a connected transportation ecosystem, providing economies of scale for application development and deployment, and lowering the cost of intelligent transportation systems over the long term. In the absence of movement forward in this important effort, DOT risks signaling that the transportation sector is less than fully committed to maintaining spectrum dedicated for improving traffic safety.

It is well established that connected vehicle applications have the potential to deliver broad safety and mobility benefits, for both passenger and commercial vehicles, throughout the 5.9GHz band. While we support efforts by the FCC and DOT to evaluate spectrum sharing in the band, we firmly believe that any potential sharing plan should work around intelligent transportation operations, and any proposed spectrum sharing plan must clearly demonstrate that there is no adverse impact to safety. Any sharing arrangements that would require rechannelizing the band would delay the implementation of DSRC based technology and the establishment of safety protocols, thus, effectively relegating vehicle safety to a secondary concern. DOT must remain engaged with the FCC as testing continues. We strongly urge the Department to work with the FCC to ensure the results of any testing related to harmful interference be promptly released to provide increased transparency and help better inform any policy making decisions.

Your comments last week at the U.S. Japan Annual Conference highlighted the potential of disruptive technologies, such as connected cars, to change the way we travel. It is important that we work together to leverage connectivity to achieve widespread benefits across our transportation system. DSRC is a proven tool that can safely, securely, and privately connect vehicles and infrastructure. Unlike other technologies, DSRC benefits from nearly a decade of industry driven standardization and large scale real-world testing, a track record that is impossible to discount or ignore. Finalizing a V2V nationwide standard and protecting the 5.9GHz band currently dedicated to intelligent transportation, will provide stakeholders throughout the transportation sector with the certainty needed to expand deployment of, and uses for, this unique cooperative traffic safety technology.

We collectively seek to modernize our outdated infrastructure, incorporating new technology in vehicles and our roadways to expand mobility, grow our economy, and save lives. As we endeavor to address the most significant challenges facing the future transportation system, it

is of critical importance that DOT support DSRC deployment and protect the 5.9 GHz band for interference-free operations. Significantly delaying efforts to establish a nationwide V2V standard would compromise NHTSA's safety efforts at time when fatalities and injuries on our roadways have been increasing.

We thank you for your attention to this matter, and we look forward to working with you.

Sincerely,

AAA
American Association of State Highway and Transportation Officials
American Traffic Safety Services Association
American Trucking Associations
Arizona Department of Transportation
Association of Global Automakers
Autotalks
Brandmotion
California Department of Transportation
California Partners For Advanced Transportation Technology (PATH)
Carnegie Mellon University's Traffic21 Institute
CH2M
Cohda Wireless Pty Ltd
Colorado Department of Transportation
Colorado Motor Carriers Association
Commercial Vehicle Training Association
Commsignia
Consensus Systems Technologies Corp ("ConSysTec")
Continental
Contra Costa Transportation Authority
DANLAW
Deep South Communications
Delphi
DENSO International America, Inc.
EasyMile
Econolite Group Inc.
General Motors
Gridsmart
Gulf Region Intelligent Transportation Society
HNTB Corporation
Honda North America, Inc.
Hyundai Motor Company
Indiana Motor Truck Association
Institute of Transportation Engineers

Insurance Institute for Highway Safety
Integral Blue (IB)
INTEGRITY Security Services
Intelligent Transportation Society of America
Intelligent Transportation Society of the Midwest
Intelligent Transportation Society of New Mexico
Intelligent Transportation Society of Tennessee
Kapsch TrafficCom North America
Kia Motors Corporation
Marben
Maricopa County Arizona Department of Transportation
Metropolitan Transportation Commission – San Francisco Bay Area
Mid Region Council of Governments of New Mexico
Michigan Department of Transportation
Minnesota Trucking Association
MioVision
Modular Mining Systems, Inc.
Mothers Against Drunk Driving
Motor & Equipment Manufacturers Association
NAFA Fleet Management Association
National Electrical Manufacturers Association (NEMA)
National Safety Council
Nevada Trucking Association
NORDSYS GmbH
NXP
Panasonic Corporation of North America
Peloton Technology
Pennsylvania Department of Transportation
Robert Bosch LLC (Bosch)
Regional Transportation Commission of Southern Nevada
Savari Networks
Securing America's Future Energy (SAFE)
Shelley Row Associates LLC
Siemens
Toyota Motor North America
Truck and Engine Manufacturers Association
University of Michigan Transportation Research Institute
Utah Department of Transportation
Virginia Tech Transportation Institute
Visteon Corporation
Volvo Group North America
WSP USA

Cc: Mick Mulvaney, Director, Office of Management and Budget